

EXHIBIT 4

From: owner-waagoogleteam@lists.susmangodfrey.com on behalf of [Santacana, Eduardo E.](#)
To: [Alex Frawley](#); [FIREBASE-WFGE](#)
Cc: WAAGOOGLTEAM@LISTS.SUSMANGODFREY.COM
Subject: RE: Rodriguez v. Google: Case Schedule
Date: Wednesday, December 21, 2022 12:36:21 PM

EXTERNAL Email

Counsel,

We don't see a justification for extending the case schedule.

We will have our portion of the brief to you next week.

Thanks,
Eduardo

—

Eduardo E. Santacana
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Pronouns: he, him, his

On December 20, 2022 at 5:38:33 AM HST, Alex Frawley <AFrawley@susmangodfrey.com> wrote:

***** EXTERNAL EMAIL *****

Counsel,

I am following up on this extension request, as well as the individual issues listed below.

Relatedly, when can we expect Google's portion of the letter brief about the documents Google withheld for Ms. Langner's deposition?

Best,
Alex

From: owner-waagoogleteam@lists.susmangodfrey.com <owner-waagoogleteam@lists.susmangodfrey.com> **On Behalf Of** Alex Frawley
Sent: Thursday, December 15, 2022 6:15 PM
To: Santacana, Eduardo E. <ESantacana@willkie.com>; [FIREBASE-WFGE](#) <FIREBASE-WFGE@willkie.com>
Cc: WAAGOOGLTEAM@LISTS.SUSMANGODFREY.COM
Subject: Rodriguez v. Google: Case Schedule

EXTERNAL Email

Counsel,

We write to request an extension of the January 20 deadline for opening expert reports. We are asking for this extension as a courtesy in light of the holidays and also because of where things stand in terms of completing agreed upon discovery that is relevant for these expert reports. For example:

- Google has not yet provided the results of our Dasle search query.
- Google has not yet provided the agreed upon information relating to Plaintiffs' RFP Set 9 (*see* Ryan Sila's December 8 follow-up email).
- Google only yesterday permitted Plaintiffs to share with two experts the deposition transcripts for this case.
- Google has not yet completed its supplemental productions and interrogatory responses relating to the WAA disclosures.
- Google has not yet started the discussed data production process, even limited to the logs Google has identified and agreed to be in scope.

Given this work that still needs to be done, Plaintiffs request the following extended deadlines. Of course, if the Court grants some or all of Plaintiffs' pending motions, this request may become moot or there may be a need for another discussion about deadlines.

<u>Action</u>	<u>Current Deadline</u> (Dkt. 246)	<u>Plaintiffs' Proposed</u> Deadline
Initial Expert Witness Disclosures:	January 20, 2023	April 21, 2023
Rebuttal Expert Witness Disclosures:	May 1, 2023	July 31, 2023
Close of Expert Discovery:	June 2, 2023	September 1, 2023
Motion for Class Certification:	June 9, 2023	September 8, 2023
Opposition to Class Certification:	July 14, 2023	October 13, 2023
Reply in Support of Class Certification:	August 10, 2023	November 9, 2023
Hearing on Class Certification:	August 24, 2023 at 1:30 PM	TBD

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